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11 *Attorneys for Defendant*
12 *NETFLIX, INC.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 LAURI VALJAKKA,

16 *Plaintiff,*

17 v.

18 NETFLIX, INC.,

19 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF JASSIEM MOORE
IN SUPPORT OF DEFENDANT
NETFLIX, INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

Judge: Hon. Jon S. Tigar

1 I, Jassiem Moore, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in Seattle,
3 Washington, and counsel representing Defendant Netflix, Inc. I have personal knowledge of the
4 facts set forth in this declaration and am competent to testify.

5 2. Pursuant to Civil L.R. 79-5(e), I make this declaration in support of Netflix's
6 Administrative Motion to File Documents Under Seal Pursuant to Civil L.R. 79-5
7 ("Administrative Motion") (Dkt. 161) to establish that certain documents contain material that
8 discusses Netflix's confidential and proprietary software, and has been designated by Netflix as
9 Protected Material as defined by § 2(f) of the Stipulated Protective Order for Litigation Involving
10 Patents, Highly Sensitive Confidential Information and/or Trade Secrets (Dkt. No. 56)
11 ("Protective Order").

12 3. On September 27, 2023, the Court issued an Order denying Netflix's
13 Administrative Motion to seal Exhibit 15 attached to the Declaration of Elise Edlin in Support of
14 Netflix's Motion for Summary Judgment ("Edlin Declaration"), which is excerpts of the
15 deposition transcript of Ishaan Shastri, dated June 2, 2023, because Netflix's proposed redactions
16 were not narrowly tailored.

17 4. Attached hereto as Exhibit A is a true and correct copy of Exhibit 15 attached to
18 the Edlin Declaration with narrowly tailored redactions. Netflix inadvertently submitted the entire
19 deposition, but intended to submit excerpts with narrowly tailored redactions. The designated
20 portions of this transcript contain confidential information regarding Netflix's proprietary
21 software.

1 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
2 and correct to the best of my knowledge.

3 Executed on September 28, 2023 in Seattle, Washington.

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5 /s/ Jassiem Moore
6 Jassiem Moore
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CERTIFICATE OF SERVICE

I, Kate Rose, declare:

I am a citizen of the United States and employed by the firm of Perkins Coie LLP in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. On September 28, 2023, I caused to be served a true copy of the sealed version of the following documents

- **EXHIBIT A TO THE DECLARATION OF JASSIEM MOORE IN SUPPORT OF NETFLIX'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL.**

upon counsel as listed below:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on September 28, 2023.

/s/ Kate Rose
Kate Rose